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May 13, 2025

VIA ECF

The Honorable Gregory H. Woods  
 United States District Court  
 Southern District of New York  
 Daniel Patrick Moynihan United States Courthouse  
 500 Pearl Street, Room 2260  
 New York, New York 10007

**MEMORANDUM ENDORSED**

USDC SDNY  
 DOCUMENT  
 ELECTRONICALLY FILED  
 DOC #: \_\_\_\_\_  
 DATE FILED: 5/13/2025

**Re: Jane Doe v. DNA Diagnostics Center, LLC et al., No. 1:25-cv-02878-GHW**

Dear Judge Woods:

I represent Plaintiff, Jane Doe, in this matter. I write jointly with Defendant DDC Diagnostics Center, LLC (“DDC”) to request an extension of time for filing my motion to remand. We respectfully have agreed to and request the following:

Pursuant to part rules §1E we state and request the following:

1. The original due date for plaintiff’s motion to remand is May 15, 2025 (see Order at ECF Doc #23).
2. There have been no previous requests for extensions of time regarding the motion to remand. No other dates will be affected. As Ordered (ECF Doc # 8), the parties will submit their Proposed Civil Case Management Plan and Scheduling Order on or before May 21, 2025 and will appear for the Conference on May 28, 2025 at 4:00pm.
3. The reason for the request is that DDC is in the process of collecting the documents identified in its response to Plaintiff’s pre-motion letter concerning the diversity citizenship of Defendant Winn Health Labs, LLC (“Winn”). The parties have tentatively agreed that if defendant Winn provides copies demonstrating Winn’s diversity citizenship, then plaintiff will agree to withdraw her request to remand. Given Winn’s citizenship evidence plaintiff previously found, which was stated in

the letter for a pre-motion conference request (ECF Doc #14), it is possible that New York may still have residual aspects of Winn's citizenship which are not yet updated to reflect Winn's move to Georgia. Rather than taking up the Court's and parties' time with the motion to remand, Plaintiff will consider withdrawing the motion to remand if sufficient documentation establishing Winn's diversity citizenship is provided.

4. The parties have discussed this request and consent to this request.
5. The parties propose the date be extended as follows:
  - a. Plaintiff's time to file a motion to remand (or file a letter withdrawing the request to remand) from May 15, 2025 to June 5, 2025.
  - b. Defendants' time to file opposition from June 5, 2025 to June 26, 2025.
  - c. Plaintiff's time to file a reply from June 12, 2025 to July 3, 2025.

The parties respectfully request that the Court approve the agreed-upon dates above. We thank the Court for its time and courtesies.

Dated: May 13, 2025  
 New York, New York



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Application granted. The deadline for Plaintiff to file her proposed motion to remand is extended to June 5, 2025. Defendants' opposition is due no later than June 26, 2025. Plaintiff's reply is due no later than July 3, 2025. Additionally, the initial pretrial conference scheduled for May 28, 2025 is adjourned to June 12, 2025 at 4:00 p.m. The deadline for the parties to file the joint letter and proposed case management plan outlined in the Court's April 9, 2025 order, Dkt. No. 8, is extended to June 6, 2025. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 31.

SO ORDERED.

Dated: May 13, 2025  
 New York, New York



GREGORY H. WOODS  
 United States District Judge